

"Robert Ehe"

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cc: "Arthur Heath" <AHEATH@rb4.swrcb.ca.gov>, "David Bacharowski"

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Subject: Former Nova Techno Corporation facility at 1368 Oregon Avenue, Long Beach

Angela

Concerning the "No further requirements" (NFR) letter issued by the Regional Board on October 23, 2003, for the former Nova Techno Corporation facility at 1368 Oregon Avenue, Long Beach. This letter provided notice on whether no further requirements have been met for cleanup or investigation of the soil and groundwater beneath the facility location. The letter states "residual contaminants remaining in soil, while remaining above screening levels, are protective of groundwater quality."

Nova Techno Corporation purchased the property in March 1977 and operated the facility specializing in machining and hard chrome plating until January 1996. The facility had three vaulted open tanks on site used for plating (two plating tanks and one rinse tank). The two plating tanks and surrounding hexavalent chromium contaminated soil were removed in July 2003. Ten truckloads of hexavalent chromium contaminated soil were removed and disposed of at a permitted facility. The rinse tank vault was filled with self-compacting gravel and left in place. Residual contaminated soil was left in place at a location onsite because of its the proximity of the building bearing wall to the east of the rinsate tank. The excavation terminated at a maximum depth of 12 feet below ground surface (bgs).

Groundwater was not encountered during the excavation. Soil samples were collected at various locations along the excavation sidewalls and the bottom of the excavation to determine concentrations of hexavalent chromium present. The highest concentration of hexavalent chromium remaining was detected at 738 milligrams per kilogram (mg/kg) located 12 feet bgs. This concentration exceeds screening levels, however excavation at this location may have put the building at risk. The maximum concentration of hexavalent chromium in the soil removed from the excavation was 3,110 mg/kg that was located 8 feet bgs. The letter states was an unauthorized discharge of wastes at the facility that was in violation of water quality objectives established by Regional Board. However, the shallow perched groundwater encountered is not of currently used for domestic purposes, therefore, no further sampling of groundwater were required. The residual hexavalent chromium remaining in soil at the

site are not sufficient in concentration to further threaten groundwater quality.

There are conditions attached to the findings of the NFR letter. Existing groundwater monitoring wells shall be maintained until further notice by this Regional Board, the owner of the property shall notify the Regional Board of any disturbance of the groundwater monitoring wells. A written notification must be provided to the Regional Board within 72 hours should additional contamination be encountered during any future activities at any other portions of the property. Also a written notification must be submitted to this Regional Board should a change of current land use be proposed for the site.

There was no disclosure to Regional Board staff that a change of use was intended, in fact this case closure was granted with the expectation of continued industrial use. It is our opinion that the city should conduct its own health risk assessment prior to any change of property use. That change of use should be qualified for the purpose proposed. We request you send the Executive Officer of the Regional Board a detailed letter explaining and justifying the intended change of use for this property as soon as possible. Thank you.

Robert Ehe
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